

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

NOTICE OF MOTION

JOSEPH BONGIOVANNI,

Case No.: 19-CR-227

PETER GERACE, JR.,

Defendants.

UNITED STATES OF AMERICA,

v.

Case No.: 23-CR-37

PETER GERACE, JR.,

PLEASE TAKE NOTICE that by and through counsel, Peter Gerace, Jr. (Mark A. Foti, Esq. and Eric M. Soehnlein, Esq.) respectfully requests an Order of the Court: (1) dismissing the above referenced indictments; (2) ordering disclosure as set forth in the attached declaration; and (3) for such other and further relief as the Court deems just and proper.

DATED: July 31, 2024

s/ Mark A. Foti, Esq.

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